

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CABLE NEWS NETWORK, INC., MS NOW
CABLE, LLC, POLITICO LLC, ET AL.,

Plaintiffs,

v.

DONALD J. TRUMP, ET AL.,

Defendants.

Civil Case No. 1:26-cv-03287-TJK

**SUPPLEMENTAL DECLARATION
OF DAVID VIGILANTE**

SUPPLEMENTAL DECLARATION OF DAVID VIGILANTE

I, David Vigilante, hereby declare as follows:

1. I am over 18 years of age, am competent, and make this declaration based upon my own personal knowledge, my review of CNN's business records, and information provided to me in the course of my duties by CNN personnel with knowledge of the matters described.

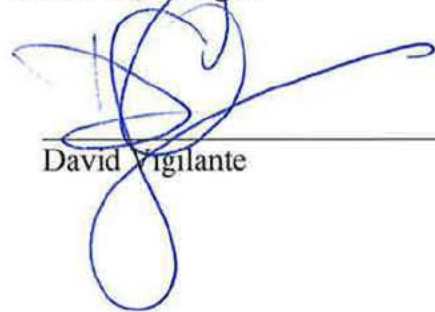
2. I am the Executive Vice President and Head of Legal of Cable News Network, Inc. (CNN), a Plaintiff in this action. I make this declaration in support of Plaintiffs' Motion for a Preliminary Injunction. If called to do so, I could and would competently testify to these matters under oath. In the course of my duties, I am familiar with CNN's White House operations, including its Washington, D.C. bureau, its participation in the White House press pool, the credentials its journalists hold, and the facilities CNN maintains on the White House complex.

3. On September 27, 2026, the White House identified CNN as the television network pooler for the in-town press rotation on October 1, 2026. Being listed as the in-town television network pooler typically indicates that you are the designated television network pooler for the full day, including any travel or out-of-town events. On September 29, 2026, consistent with the standard practice for upcoming presidential travel, CNN submitted a manifest for Air Force One

in connection with the President's October 1 trip to Texas and Oklahoma. On the morning of September 30, 2026, however, CNN learned through the pool chair that it would not be permitted to travel aboard Air Force One as the designated television network pooler. As a result, CNN was again prevented from traveling aboard Air Force One and performing the totality of its assigned duties as the designated television network pooler. CNN did not receive any explanation from the White House for its exclusion from the October 1 trip.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 5th day of October 2026 in Atlanta, Georgia.



David Vigilante